

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK RATIONALIZATION
SERVICE CHANGES, 2011

Docket No. N2012-1

**UNITED STATES POSTAL SERVICE FIRST SET OF
INTERROGATORIES AND REQUESTS FOR
PRODUCTION TO NATIONAL POSTAL MAIL
HANDLERS UNION WITNESS HORA
(USPS/NPMHU-T1-1-7)
(May 23, 2012)**

Pursuant to Rules 25 through 28 of the Rules of Practice, the United States Postal Service directs the following interrogatories and requests for production to National Postal Mail Handlers Union witness Michael Hora (NPMHU-T-1).

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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May 23, 2012

UNITED STATES POSTAL SERVICE INTERROGATORIES AND REQUESTS FOR
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Instructions and Definitions

The term “describe” shall mean to detail in full, with specificity, the event or situation at issue.

The term “documents” has the meaning as ascribed within the Federal Rules of Civil Procedure and includes any documents or things that constitute or contain matters that are relevant to the subject matter of this proceeding and that are in the custody or control of the witness.

The term “relating” shall mean pertaining, describing, referring, evidencing, reflecting, discussing, showing, supporting, contradicting, refuting, constituting, embodying, containing, concerning, identifying, or in any way logically or factually connected with the matter discussed.

The words “or” and “and” shall be read in the conjunctive and not in the disjunctive wherever they appear, and neither of these words shall be interpreted to limit the scope of a request. The use of a verb in any tense shall be construed as the use of the verb in all other tenses and the singular form shall be deemed to include the plural, and vice-versa. The singular form of any noun shall be deemed to include the plural, and vice-versa.

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Interrogatories and Requests for Production

USPS/NPMHU-T1-1: On page 1; line14 through page 2, line 5 of your testimony, you state:

[b]ased on my review of these documents, my conversations with NPMHU members and officers from around the country, and my years as a Postal employee working in mail processing facilities, I am concerned that the Postal Service has over-estimated the savings associated with the proposed consolidations, under-estimated the effects it will have on the efficient delivery of the mail, and has generally failed to consider adequately the concerns of employees and mailing customers.

- a. Please identify “these documents” (including all page citations) that you reviewed and the individuals with whom you conversed to form the basis of your opinion.
- b. Please provide copies of all non-publicly available documents identified in your response to subpart (a) or relating to the referenced conversations with the individuals identified in subpart (a).

USPS/NPMHU-T1-2: On page 3, lines 11 through 14 of your testimony, you state:

based on my experience working in Postal facilities and my discussions with Mail Handlers working across the country, the Postal Service is drastically over-estimating the amount of productivity increases it will be able to achieve.

Please describe, in detail, all evidence you rely upon in support of your statement.

USPS/NPMHU-T1-3: On page 4, lines 22 through 24 of your testimony, you state “[i]n other facilities where mail processing has stopped and the facility is now used as a hub, we typically see a need for anywhere from three to two dozen Mail Handlers to staff the cross-dock operations.” In addition to mail handlers, describe, in detail, what other Postal Service employees and contractors support hub operations, among other tasks, removing containers from trucks and moving containers throughout Postal Service facilities, including but not limited to Function 4 facilities.

USPS/NPMHU-T1-4: On page 5, line 4 of your testimony, you state “the AMPs do not seem to adequately budget for the relocation costs.” Please describe, in detail, all evidence (including page citations) you rely upon in support of your statement.

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USPS/NPMHU-T1-5: On page 6, lines 4 through 5 of your testimony, you state “[i]n my experience, the machines break down more often the more they are run.”

- a. Please describe, in detail, your experience, education, or training related to the maintenance procedures, routines or operating parameters of mail processing equipment used by the Postal Service.
- b. Please produce any documents or data that you relied upon in support of your statement.

USPS/NPMHU-T1-6: On page 6, lines 22 through 24 of your testimony, you state:

I heard many complaints from members and officers across the country that the public hearings were not conducted in such a way as to enable the public to provide meaningful input.

- a. Please identify the names of members and officers from whom you heard complaints that the public meetings did not provide a means for the public to provide meaningful input.
- b. For each individual identified in subpart (a) above, please identify the specific public meeting(s) that the individual attended.
- c. Please identify what, if any, public meetings you attended.
- d. Please provide any documents that you prepared relating to any meetings you attended or any complaints you received from members and officers regarding the public meetings.

USPS/NPMHU-T1-7: On page 7, lines 9 through 13 of your testimony, you state that for those facilities identified in footnote 2 of your testimony “[t]here was essentially no process by which the Postal Service solicited and received public input.” Please describe, in detail, any evidence to support your position that the Postal Service must conduct a public hearing pursuant to USPS Handbook PO-408.